

1 KATHLEEN BLISS, ESQ.
2 Nevada Bar No. 7606
3 kb@kathleenblisslaw.com
4 KATHLEEN BLISS LAW PLLC
5 1070 West Horizon Ridge Pkwy., Suite 202
6 Henderson, Nevada 89012
7 Telephone: 702.463.9074

8 *Attorney for Daniel Barnes*

9
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 DANIEL BARNES,

16 Defendant.

17 CASE NO.: 2:13-cr-00423-JCM

18 **STIPULATION AND ORDER
TO EXTEND DEFENDANT'S REPLY
FOR COMPASSIONATE RELEASE
(First Request)**

19 IT IS HEREBY STIPULATED AND AGREED, by Kathleen Bliss, Esq., counsel for
20 Anthony Jordan, and William R. Reed, Esq., counsel for the United States of America, that the
21 deadline on which defendant must file his reply brief in support of Compassionate Relief on
22 August 20, 2021, ECF No. 350, be extended fourteen days to date on or before September 3, 2021.

23 This stipulation is entered into based upon the following reasons:

- 24
- 25 1. On August 6, 2021, defendant filed a motion for compassionate release. ECF No. 346.
 - 26 2. The government filed its response on August 13, 2021, ECF No. 350, and defendant's
27 reply brief is due on or before August 20, 2021.
 - 28 3. Counsel for defendant has conflicting deadlines that prevent her from effectively
29 preparing and filing a reply on August 20, 2021.
 - 30 4. Counsel is having difficulties reaching Mr. Barnes at USP McCreary where he is

KATHLEEN BLISS LAW PLLC
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TEL 702.793.4202

1 housed. Counsel's paralegal has reached out to defendant's counselor and is awaiting
2 a reply for a call between counsel and defendant.

- 3 5. Counsel needs to speak to defendant before she can file a reply to the government's
4 response.
5 6. The parties agree to the extension of time.
6 7. This is the first request for extension of time.
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8
9 Dated this 16th day of August 2021

10
11 /s/William R. Reed
12 WILLIAM R. REED, ESQ.
13 Assistant U.S. Attorney
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/s/Kathleen Bliss
KATHLEEN BLISS, ESQ.
Counsel for Daniel Barnes

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

CASE NO.: 2:13-cr-00423-JCM

Plaintiff,

ORDER

VS.

DANIEL BARNES,

Defendant.

Based upon the stipulation of counsel, and good appearing, IT IS HEREBY ORDERED
that defendant's reply brief for Compassionate Release shall be due on or before September 3,
2021.

DATED August 18, 2021.

KATHLEEN BLISS LAW PLLC
1070 W. HORIZON RIDGE PKWY., SUITE 202
HENDERSON, NEVADA 89012
TEL 702.793.4202

THE HONORABLE JAMES C. MATHAN
UNITED STATES DISTRICT JUDGE

1
2 **CERTIFICATE OF SERVICE**
3

4 I certify that I am an employee of KATHLEEN BLISS LAW PLLC and that on this 16th day of
5 August 2021, I did cause a true copy of:

6 **STIPULATION AND PROPOSED ORDER TO EXTEND DEFENDANT'S REPLY FOR**
7 **COMPASSIONATE RELEASE**
8

9 To be served via electronic service by the U.S. District Court CM/ECF system to the parties on
10 the Electronic Filing system in this action.
11

12 By: /s/Priscilla Horvath
13 An employee of
14 KATHLEEN BLISS LAW PLLC
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